

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re: PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.¹

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INFORMATIVE MOTION REGARDING COMMONWEALTH'S
MOTION FOR STAY RELIEF TO PROSECUTE FURTHER MOTIONS
FOR PARTIAL SUMMARY JUDGMENT

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for April 28–29, 2021, Omnibus Hearing* [Case No. 17-3283, ECF No. 16475], the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as representative of the Commonwealth of Puerto Rico (the "Commonwealth") pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"),² respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The parties will appear telephonically at the omnibus hearing on the *Motion and Memorandum of Law in Support of Motion for Stay Relief Granting Leave to Prosecute Further Motions for Partial Summary Judgment* [Case No. 17-3283, ECF Nos. 16326-27; Adv. Case No. 20-0003, ECF Nos. 142-43; Adv. Case No. 20-0004, ECF Nos. 133-34; Adv. Case No. 20-0005, ECF Nos. 154-55] (the “Motion”) as well as any and all objections, responses, statements, joinders, and replies to the Motion.

2. The following individuals may appear to speak on behalf of the parties:

- a. Oversight Board: Michael Firestein
- b. Official Committee of Unsecured Creditors: Luc Despins
- c. Financial Guaranty Insurance Company: Martin Sosland
- d. Ambac Assurance Corporation: Atara Miller

3. The parties understand the Court has allocated 50 minutes for a hearing on the Motion. The parties have agreed to allocate such time as follows, listed in the order in which the parties shall present:

- a. Movants
 - i. Oversight Board: 13 minutes
 - ii. Official Committee of Unsecured Creditors: 1 minute
- b. Objecting Parties
 - i. Financial Guaranty Insurance Company: 12.5 minutes
 - ii. Ambac Assurance Corporation: 12.5 minutes
- c. Movants
 - i. Oversight Board: 11 minutes

Dated: April 23, 2020.
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock
Martin J. Bienenstock
(Admission *pro hac vice*)
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

*Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*

/s/ Hermann D. Bauer
Hermann D. Bauer
USDC No. 215205
O'NEILL & BORGES LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944
*Co-Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*